

PRODUCT PERFORMANCE / EFFICACY REVIEW

Mark Suarez, Entomologist - IB

Mark E. S.
13 APRIL 2006

DATE: 13 April 2006

EPA REG. NUMBER: 75191-R

PRODUCT NAME: ITON Insect Control Landscaping Fabric

REGISTRANT: Atex, Inc.

PM: George LaRocca, PM 13
REVIEWER: BeWanda Alexander

DECISION #: 350212
DP BARCODE: 311751

ACTION: R32

ACTIVE INGREDIENT(S): 128825, Bifenthrin.....0.125%

TYPE: Impregnated Fabric

OPPTS GUIDELINE(S): 810.1000
810.3000
810.3500

MRID: 4638²805
N

GLP ?: No.

SITES: Outdoors

PESTS: Ants (Fire and Carpenter), Centipedes,
Fleas, Flies, Mosquitoes, Roaches,
Scorpions, Spiders, Ticks,

STUDY APPLICATION RATE: 0.125% in fabric

LABEL APPLICATION RATE: 0.125% in fabric

STUDY SUMMARIES:

The registrant submitted data from laboratory trials in which insect were in direct contact with the treated fabric for 24 hours. Mortality from direct exposure was generally demonstrated if insect are forced to remain in contact with the treated fabric for long periods of time.

ENTOMOLOGIST'S COMMENTS AND RECOMMENDATIONS:

The validity of the protocol is questionable. The exposure duration far exceeds that normally accepted for similar claims (i.e., a 5 minute exposure with a mortality count at 24 hours). Furthermore, the directions for use state that the product should be set in place and buried under at least three inches of landscaping material (pebbles, mulch, pea gravel, etc...). When used in this manner insects are not likely to contact the fabric. With the possible exception of pillbugs and sowbugs, none of the pests listed on the label are likely to come into contact with the fabric during their life cycles.

Recommendations:

- *Remove all arthropod pests from the label.*

The product has not been demonstrated, and is not likely, to perform as labeled. Therefore, all arthropod pests are to be removed from the label. Data may be submitted or cited in support of the addition of specific target pests to the label. The data must demonstrate that the product provides effective kill of the target insects (i.e., $\geq 90\%$ mortality) when used in a manner consistent with the proposed product labeling. The submission of a protocol for review prior to data collection is encouraged.

Enclosure

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